

U.S. ENVIRONMENTAL PROTECTION AGENCY
REGION I
J.F.K. FEDERAL BUILDING, BOSTON, MA, 02203-1911

MEMORANDUM

DATE: July 13, 1995

SUBJ: Compliance Evaluation Inspection at Exxon Everett Terminal,
NPDES Permit No. MA0000833

FROM: George W. Harding, P.E., Environmental Engineer
Compliance Section

TO: Files

On June 15, 1995, I conducted a compliance evaluation inspection at the Exxon Everett Terminal. I was accompanied by Bob Pierce and Joe Isham of Exxon. My observations follow.

Treatment System

Stormwater runoff, groundwater seeping into an abandoned treatment pond, tank water drawoffs, and other minor sources are directed to an API oil-water separator. From here, flows up to 1900 gpm are pumped to a holding tank. Drainage from this tank constitutes Discharge 001A. The surface of the holding tank is periodically skimmed to remove any oil that may accumulate on its surface. Under extreme storm conditions, flow in excess of 1900gpm is bypassed around the API separator and pumped directly to the outfall; this flow constitutes Discharge 001B.

At the time of the inspection, the API separator was treating mainly groundwater seepage. The unit was operating properly, and appeared to be well maintained. Outfall 001B was not active. The residual water in the overflow wet well had a sheen. At the extreme conditions that would occur when 001B activates, this sheen would be quickly flushed out, although the oil and grease concentration would probably be well below the permit limit. The walls of the wet well appeared to be permeated with oil, so skimming the wet well would probably only temporarily remove the sheen.

Mr. Pierce raised an issue regarding the TSS limit for Discharge 001B.

Typically, 001B only activates a couple of times a year. The permit contains a monthly average limit of 30 mg/l and a maximum daily limit of 100 mg/l for TSS. However, since the discharges only occur under extreme conditions, they usually last for less than a day. Unless more than one extreme storm occurs in a given month, the monthly average is based on a single sample, and the monthly average limit effectively becomes the maximum day limit. The facility always meets the permit's maximum daily limit, but sometimes violates the monthly average limit.

Mr Pierce suggested that fine solids from the containment areas may be the cause of the problem. Exxon has a program underway to regrade the containment areas and line them with gravel which they hope will correct the problem.

Records Review

The facility's SPCC plan was up to date and appeared to be in order. Written standard operating procedures for the stormwater treatment system were also on file. The facility's monitoring records were complete and well organized.